

## REMARKS

**I. The Rejection of Claims 1, 2, 4, 6-9, 11 and 12 under 35 U.S.C. §102(e)**

Following the previous Office Action, the Examiner maintained his position on the rejection of claims 1, 2, 4, 6-9, 11 and 12 under 35 U.S.C. §102(e), asserting that Overtoom et al. discloses a dual-role compatible USB hub device identically corresponding to what is claimed. This rejection is respectfully traversed.

Applicant submits that Overtoom et al. does not disclose a USB unit control method including all the limitations recited in independent claim 1. Specifically, Overtoom et al. does not disclose, among other things, determining a function of a dual-role device assumed when it is connected to a hub, recording information indicating the function determined, comparing the information with a change in the state of D+ or D- of a USB data line to which the dual-role device is connected, and based on the comparison result, switching the function of the dual-role device from the USB host function to the USB device function or from the USB device function to the USB host function, as claimed.

First, the Examiner asserted that Overtoom et al. discloses determining the function of the dual-role device assumed when it is connected to the hub, by citing column 3, line 55 to column 4, lines 64 of Overtoom et al. Applicant believes that there is no description regarding this limitation in the reference.

For example, Overtoom et al. discloses as follows:

In operation, when the hub 102 is first powered up the USB host controller 208 asserts host control by placing a voltage Vbus on the A-ports 202. Thus, the hub 102 acts as a host controller via the USB host controller 208 as illustrated in FIG. 3 by connection lines 300. The USB host controller 208 then determines which of the A-ports 202 have a corresponding external device connected thereto.... Once initialization is complete, the hub 102 enters a state where it waits for one of the external OTG devices (not shown) to request host control of the USB bus. Column 3, lines 55 to column 4, line 10.

As cited above, Overtoom et al. does not disclose determining the function of a dual-role device assumed when it is connected to a hub, as claimed. Rather, the reference states that hub 102 waits for one of OTG devices to request host control of the USB bus, meaning that each OTC device connected to hub 102 is first set to have the USB device function.

Second, Overtoom et al. does not disclose recording information indicating the function of the dual-role device determined. The Examiner asserted “information is stored during the initialization process” (paragraph 4, lines 6-7). However, the Examiner did not clarify what information is stored, and where and when that information is obtained. In fact, Overtoom et al. in column 3, line 55 to column 4, line 64 is silent on such information. In imposing the rejection under 35 U.S.C. §102, the Examiner is required to point to “page and line” wherein an applied reference is perceived to identically disclose each feature of a claimed invention. *In re Rijckaert*, 9 F.3d 1531, 28 USPQ2d 1955 (Fed. Cir. 1993); *Lindemann Maschinenfabrik GMBH v. American Hoist & Derrick Co.*, 730 F.2d 1452, 221 USPQ 481 (Fed. Cir. 1984). The Examiner has not discharge his burden.

Third, the reference does not disclose comparing the information with the change in the state of D+ or D- of a USB data line to which the dual-role device is connected. Since Overtoom et al. does not disclose recording the information indicating the function of the dual-role device determined, it is apparent that the reference is silent on the use of such information to compare with the change in the state of D+ or D- of the USB data line. Of course, there is no comparison between the information and the change in the state of the USB data line, Overtoom et al. does not describe switching the function of the dual-role device from the USB host function to the USB device function or from the USB device function to the USB host function, based on the comparison result, as claimed.

Accordingly, it is submitted that Overtoom et al. does not disclose a USB unit control method including all the limitations recited in independent claim 1 within the meaning of 35 U.S.C. §102. Dependent claims 2, 4, 6-9, 11 and 12 are also patentably distinguishable at least because they include all the limitations recited in independent claim 1. Applicant, therefore, respectfully solicits withdrawal of the rejection of claims 1, 2, 4, 6-9, 11 and 12, and favorable consideration thereof.

**II. The Rejection of Claims 3, 5 and 10 under 35 U.S.C. §103(a)**

Applicant submits that claims 3, 5 and 10 are patentably distinguishable over the cited prior art at least because they include all the limitations recited in independent claim 1. Furthermore, neither the “On-The-Go Supplement” nor McCauley teaches or suggests the steps of claim 1 which are not disclosed by Overtoom et al. Accordingly, the “On-The-Go Supplement” and McCauley do not cure any deficiencies of Overtoom et al. Applicant, therefore, respectfully solicits withdrawal of the rejection of claims 3, 5 and 10 under 35 U.S.C. §103, and favorable consideration thereof.

**III. Conclusion**

It should, therefore, be apparent that the imposed rejections have been overcome and that all pending claims are in condition for immediate allowance. Favorable consideration is, therefore, respectfully solicited.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper,

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including extension of time fees, to Deposit Account 500417 and please credit any excess fees to such deposit account.

Respectfully submitted,

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